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Attorneys for Plaintiffs

Attorneys for Defendant

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CELERINA NAVARRO, JANET STEVENS,
ARMANDO COVARRUBIAS, EVELYN
ESTRADA, GABRIEL RANGEL JAIME,
ALMA ALDACO, and all others similarly
situated,

Plaintiffs,

v.

THE CITY OF MOUNTAIN VIEW,

Defendant.

Case No. 5:21-cv-05381-NC

**JOINT UPDATE REGARDING
NOTICE OF TENTATIVE
SETTLEMENT (ECF 99)**

1 Counsel for Plaintiffs Celerina Navarro, Janet Stevens, Armando Covarrubias, Evelyn
 2 Estrada, Gabriel Rangel Jaime, and Alma Aldaco (“Plaintiffs”), and Defendant the City of
 3 Mountain View (“the City”) (collectively, the “Parties”) hereby update their Notice of Tentative
 4 Settlement (ECF 99) as follows. The Parties previously informed the Court that they would
 5 provide this update if they had not finalized the settlement by August 30, 2022. ECF 99.

6
 7 The Parties believe it is reasonable to expect that they will have translated the settlement
 8 agreement and obtained all necessary signatures on or before September 9, 2022. The Parties will
 9 update the Court by September 9, 2022 as to whether they have finalized the agreement, and
 10 whether they request that the Case Management Conference currently scheduled for September
 11 14, 2022 be vacated. Out of an abundance of caution, the Parties hereby agree to continue any
 12 and all deadlines to respond to outstanding discovery by 30 days and respectfully jointly request
 13 a 30-day extension of all other court deadlines.
 14

15 Respectfully submitted,

16 Dated: August 30, 2022.

LAW FOUNDATION OF SILICON VALLEY

18 By: /s/ Erin Neff

ERIN NEFF

19 *Attorney for Plaintiffs*

21 Dated: August 30, 2022.

OLSON | REMCHO LLP

23 By: /s/ Margaret R. Prinzing

MARGARET R. PRINZING

24 *Attorney for Defendant City of Mountain View*

L.R. 5-1 ATTESTATION

I, Erin Neff, attest that all signatories listed herein, and on whose behalf this filing is submitted, concur in this filing's content and have authorized this filing.

By: /s/ Erin Neff